

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

K-SWISS, INC.,

Plaintiff,

v.

M.B.D. No. 05-10203-JLT

PAYLESS SHOESOURCE, INC.,

Defendant.

Declaration of R. Cameron Garrison

I, R. Cameron Garrison, declare and testify as follows:

1. I am an attorney with Lathrop & Gage, LC ("Lathrop & Gage"). I represent defendant Payless ShoeSource, Inc. ("Payless") in *K-Swiss, Inc. v. Payless ShoeSource, Inc.*, Case No. CV04-0779 RJK (RCx), currently pending in the United States District Court for the Central District of California.

2. I have supervised the production of documents by Payless to plaintiff K-Swiss, Inc. ("K-Swiss") and have personal knowledge of the details of such production.

3. As of May 31, 2005, Payless has produced approximately 386,942 pages of discovery to K-Swiss. The document production is ongoing.

4. Payless has produced or will produce all relevant, non-privileged documents in its possession relating to Mercury International Trading Corp.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing statements are true and correct.

Executed this 31 day of May, 2005, at Kansas City, Missouri



R. Cameron Garrison
R. Cameron Garrison